

District I
1625 N. French Dr., Hobbs, NM 88240
District II
811 S. First St., Artesia, NM 88210
District III
1000 Rio Brazos Road, Aztec, NM 87410
District IV
1220 S. St. Francis Dr., Santa Fe, NM 87505

State of New Mexico
Energy Minerals and Natural
Resources Department

Oil Conservation Division
1220 South St. Francis Dr.
Santa Fe, NM 87505

Form C-141
Revised August 24, 2018
Submit to appropriate OCD District office

Incident ID	NAPP2307233858
District RP	
Facility ID	
Application ID	

Release Notification

Responsible Party

Responsible Party ETC Texas Pipeline, Ltd.	OGRID 371183
Contact Name Dean D. Ericson	Contact Telephone 432-238-2142
Contact email dean.ericson@energytransfer.com	Incident # (assigned by OCD)
Contact mailing address 600 N. Marienfeld St., Suite 700, Midland, TX 79701	

Location of Release Source

Latitude 32.3824 Longitude -103.203046
(NAD 83 in decimal degrees to 5 decimal places)

Site Name M-4 Release	Site Type Pipeline
Date Release Discovered 03/09/2023	API# (if applicable)

Unit Letter	Section	Township	Range	County
	19	22S	R37E	Lea

Surface Owner: ☒ State ☐ Federal ☐ Tribal ☐ Private (Name: _____)

Nature and Volume of Release

Material(s) Released (Select all that apply and attach calculations or specific justification for the volumes provided below)

<input type="checkbox"/> Crude Oil	Volume Released (bbls)	Volume Recovered (bbls)
<input type="checkbox"/> Produced Water	Volume Released (bbls)	Volume Recovered (bbls)
	Is the concentration of dissolved chloride in the produced water >10,000 mg/l?	<input type="checkbox"/> Yes <input type="checkbox"/> No
<input type="checkbox"/> Condensate	Volume Released (bbls)	Volume Recovered (bbls)
<input checked="" type="checkbox"/> Natural Gas	Volume Released (Mcf) 3.5	Volume Recovered (Mcf)
<input checked="" type="checkbox"/> Other (describe) Pipeline Liquids	Volume/Weight Released (provide units) 60.60bbls	Volume/Weight Recovered (provide units) 0bbls
Cause of Release Unknown at this time		

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Was this a major release as defined by 19.15.29.7(A) NMAC? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	If YES, for what reason(s) does the responsible party consider this a major release? > 25bbbls released
If YES, was immediate notice given to the OCD? By whom? To whom? When and by what means (phone, email, etc)? Notice given by Dean D. Ericson to Jennifer Nobui on 03/10/23 by phone	

Initial Response

The responsible party must undertake the following actions immediately unless they could create a safety hazard that would result in injury

<input checked="" type="checkbox"/> The source of the release has been stopped. <input checked="" type="checkbox"/> The impacted area has been secured to protect human health and the environment. <input checked="" type="checkbox"/> Released materials have been contained via the use of berms or dikes, absorbent pads, or other containment devices. <input type="checkbox"/> All free liquids and recoverable materials have been removed and managed appropriately.	
If all the actions described above have <u>not</u> been undertaken, explain why: Per NMSLO, Arc Survey must be completed prior to any ground disturbance. Arc Survey has not been completed at this time. Qualified Arc Monitor is not available to be on-site until 03/15/23 to begin initial Clean-up efforts	
Per 19.15.29.8 B. (4) NMAC the responsible party may commence remediation immediately after discovery of a release. If remediation has begun, please attach a narrative of actions to date. If remedial efforts have been successfully completed or if the release occurred within a lined containment area (see 19.15.29.11(A)(5)(a) NMAC), please attach all information needed for closure evaluation.	
I hereby certify that the information given above is true and complete to the best of my knowledge and understand that pursuant to OCD rules and regulations all operators are required to report and/or file certain release notifications and perform corrective actions for releases which may endanger public health or the environment. The acceptance of a C-141 report by the OCD does not relieve the operator of liability should their operations have failed to adequately investigate and remediate contamination that pose a threat to groundwater, surface water, human health or the environment. In addition, OCD acceptance of a C-141 report does not relieve the operator of responsibility for compliance with any other federal, state, or local laws and/or regulations.	
Printed Name: <u>Dean D. Ericson</u>	Title: <u>Sr. Environmental Specialist</u>
Signature: <u>Dean D. Ericson</u>	Date: <u>03/10/2023</u>
email: <u>dean.ericson@energytransfer.com</u>	Telephone: <u>432-238-2142</u>
<u>OCD Only</u>	
Received by: <u>Jocelyn Harimon</u>	Date: <u>03/13/2023</u>

Incident ID	NAPP2307233858
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Site Assessment/Characterization

This information must be provided to the appropriate district office no later than 90 days after the release discovery date.

What is the shallowest depth to groundwater beneath the area affected by the release?	<u>UNK</u> (ft bgs)
Did this release impact groundwater or surface water?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a continuously flowing watercourse or any other significant watercourse?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 200 feet of any lakebed, sinkhole, or playa lake (measured from the ordinary high-water mark)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of an occupied permanent residence, school, hospital, institution, or church?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 500 horizontal feet of a spring or a private domestic fresh water well used by less than five households for domestic or stock watering purposes?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 1000 feet of any other fresh water well or spring?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within incorporated municipal boundaries or within a defined municipal fresh water well field?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within 300 feet of a wetland?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying a subsurface mine?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release overlying an unstable area such as karst geology?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Are the lateral extents of the release within a 100-year floodplain?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Did the release impact areas not on an exploration, development, production, or storage site?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Attach a comprehensive report (electronic submittals in .pdf format are preferred) demonstrating the lateral and vertical extents of soil contamination associated with the release have been determined. Refer to 19.15.29.11 NMAC for specifics.

Characterization Report Checklist: *Each of the following items must be included in the report.*

- ☒ Scaled site map showing impacted area, surface features, subsurface features, delineation points, and monitoring wells.
- ☐ Field data
- ☐ Data table of soil contaminant concentration data
- ☒ Depth to water determination
- ☒ Determination of water sources and significant watercourses within ½-mile of the lateral extents of the release
- ☐ Boring or excavation logs
- ☐ Photographs including date and GIS information
- ☒ Topographic/Aerial maps
- ☐ Laboratory data including chain of custody

If the site characterization report does not include completed efforts at remediation of the release, the report must include a proposed remediation plan. That plan must include the estimated volume of material to be remediated, the proposed remediation technique, proposed sampling plan and methods, anticipated timelines for beginning and completing the remediation. The closure criteria for a release are contained in Table 1 of 19.15.29.12 NMAC, however, use of the table is modified by site- and release-specific parameters.

State of New Mexico
Oil Conservation Division

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✓ Printed Name: Dean D. Ericson Title: Sr. Environmental Specialist
✓ Signature: Dean D. Ericson Date: 041023
email: dean.ericson@energytransfer.com Telephone: 432-238-2142

OCD Only

Received by: Jocelyn Harimon Date: 04/10/2023

Dean D. Ericson

Dean D. Ericson

dean.ericson@energytransfer.com

Sr. Environmental Specialist

041023

432-238-2142

Incident ID	NAPP2307233858
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Remediation Plan

Remediation Plan Checklist: Each of the following items must be included in the plan.

- ☒ Detailed description of proposed remediation technique
- ☒ Scaled site map with GPS coordinates showing delineation points
- ☒ Estimated volume of material to be remediated
- ☒ Closure criteria to be used in accordance with 19.15.29.12(C)(4) NMAC
- ☒ Proposed schedule for remediation (note if remediation plan timeline is more than 90 days OCD approval is required)

Dean D. Ericson

Sr. Environmental Specialist

Dean D. Ericson

041023

dean.ericson@energytransfer.com

432-238-2142

Deferral Requests Only: Each of the following items must be confirmed as part of any request for deferral of remediation.

- ☐ Contamination must be in areas immediately under or around production equipment where remediation could cause a major facility deconstruction.
- ☐ Extents of contamination must be fully delineated.
- ☐ Contamination does not cause an imminent risk to human health, the environment, or groundwater.

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Printed Name: Dean D. Ericson

Title: Sr. Environmental Specialist

Signature: Dean D. Ericson

Date: 041023

email: dean.ericson@energytransfer.com

Telephone: 432-238-2142

OCD Only

Received by: Jocelyn Harimon

Date: 04/10/2023

☒ Approved ☐ Approved with Attached Conditions of Approval ☐ Denied ☐ Deferral Approved

Signature: Jennifer Nobui

Date: 05/11/2023

2135 S. Loop 250,
Midland, Texas 79703
United States
www.ghd.com

Our ref: 12608422

March 29, 2023

State of New Mexico Energy, Minerals and Resource Oil Conservation Division
District I
1625 N. French Dr.
Hobbs, NM 88240

Re: **Site Characterization and Soil Remediation Work Plan**
ETC Texas Pipeline, Ltd.
M-4 Release Site
Incident ID: nAPP2307233858
B and C-19-22S-37E, Lea County, New Mexico

1. Introduction

GHD Services, Inc. (GHD), on behalf of ETC Texas Pipeline, Ltd. (ETCTP) submits this Site Characterization and Soil Remediation Work Plan to the State of New Mexico Energy, Minerals and Resource Oil Conservation Division (OCD) District I Office. This report provides documentation of site characterization and proposed soil remediation activities in the natural gas and pipeline fluids impacted area at the M-4 Release Site (Site). The Site is located in Unit Letter B and C Section 19 of Township 22 South and Range 37 East in Lea County, New Mexico. The GPS coordinates for the release site are 32.3824° N Latitude and 103.203046° W Longitude. The surface owner of the land where the release occurred is New Mexico State Trust Land. Figure 1 depicts the Site location. The Site and other details are depicted on Figure 2.

2. Background and Regulatory Notification Information

The release is subject to the jurisdiction of the OCD District I Office in Hobbs, New Mexico. Notice was given to the OCD via Notification of Release (NOR) Submission, Action 196103. A C-141 Release Notification for this release was submitted to the OCD on March 10, 2023. The C-141 stated 3.5 Mcf of natural gas and 60.60 barrels (bbls) of other pipeline fluids were released from the pipeline. The OCD assigned the release with Incident Number nAPP2307233858. The cause of the release is unknown. Approximately 0 bbls of pipeline liquids were recovered. The Release Notification, Site Assessment/Characterization, and Remediation Plan portion of Form C-141 are attached to the front of this report.

3. Site Characterization and Closure Criteria

GHD characterized the Site according to Table I, Closure Criteria for Soils Impacted by a Release, from New Mexico Administrative Code (NMAC) Title 19, Chapter 15, Part 29, Section 12 (NMAC 19.15.29.12) (NMAC Table I Closure Criteria).

According to the Site characterization evaluation and 19.15.29.12.C(4)(a)(i), the Site is located within an area of low karst potential. No usable groundwater data was available within one-half mile of the Site. No other receptors (i.e. water wells, playas, wetlands, waterways, lakebeds, or ordinance boundaries) were located within each regulatory specified distance and/or boundary from the Site. Also based on our review, the Site is not located in a mapped floodplain. Documentation of the Site characterization and receptor review are included as Attachment A. Based on the current results of the site characterization, the criteria will default to the less than fifty (50) feet Closure Criteria as depth to water (DTW) is unknown. The current Closure Criteria are listed below:

General Site Characterization and Groundwater Information:

Site Characterization	Average Groundwater Depth (ft)
No Receptors Found	Unknown, treated as less than fifty (50) feet

Closure Criteria for Soils Impacted by a Release (NMAC 19.15.29.12)

Regulatory Standard	Chloride (mg/kg)	GRO+DRO (mg/kg)	TPH (GRO+DRO+MRO) (mg/kg)	BTEX (mg/kg)	Benzene (mg/kg)
19.15.29.13 Restoration, Reclamation and Re-Vegetation (Impacted Area 0-4 feet)	600	--	100	50	10
19.15.29.12 NMAC Table I Closure Criteria for Soils Impacted by a Release	600	--	100	50	10

4. Initial Soil Remediation Activities

On February 15, 2023, ETCTP personnel conducted initial soil excavation activities. The area was scraped to approximately one-half (0.5) foot bgs in the affected area and the soil was transported to an OCD approved disposal facility for final disposal.

5. nAPP2307233858 Proposed Work Plan

GHD, on behalf of ETCTP, proposes to excavate the impacted soils at the Site. An estimated 500 cubic yards of soil is expected to be excavated and transported to an OCD approved disposal facility for final disposal. The excavation will be backfilled with non-impacted, locally obtained soil transported to the Site.

Composite confirmation samples will be collected from the bottom of the excavation and the sidewalls of the excavation from areas representing no more than 200 square feet. Discrete soil samples will be collected from the sidewalls if any staining is observed. All confirmation samples will be taken to a certified laboratory and analyzed for benzene, toluene, ethylbenzene, and xylenes (BTEX) by EPA SW846 Method 8021B, total

petroleum hydrocarbons (TPH) by EPA SW846 Method 8015B Modified, and chloride by EPA Standard Method 4500CL-B or 300.0.

The release area is depicted on Figure 2. The remediation will be performed within 90 days after the Site Characterization and Remediation Work Plan has been approved.

Upon confirmation that all analytical results from the soil remediation activities are below Table I Closure Criteria, a closure report will be submitted to the OCD requesting Site closure.

6. Request of Workplan Approval

GHD, on behalf of ETCTP, requests approval of this Report and the proposed activities within. Upon OCD approval of the proposed activities, GHD and ETCTP will initiate the proposed activities following the completion of the archeological survey of the area. Should the proposed activities not be completed within 90 days following approval, an amended workplan will be prepared and submitted for OCD approval.

If you have any questions or comments concerning this Site Characterization and Soil Remediation Workplan, please do not hesitate to contact our Midland office at (432) 686-0086.

Sincerely,

GHD



Nate Reece
Environmental Scientist

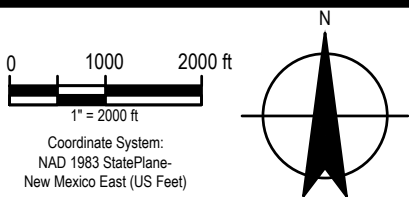
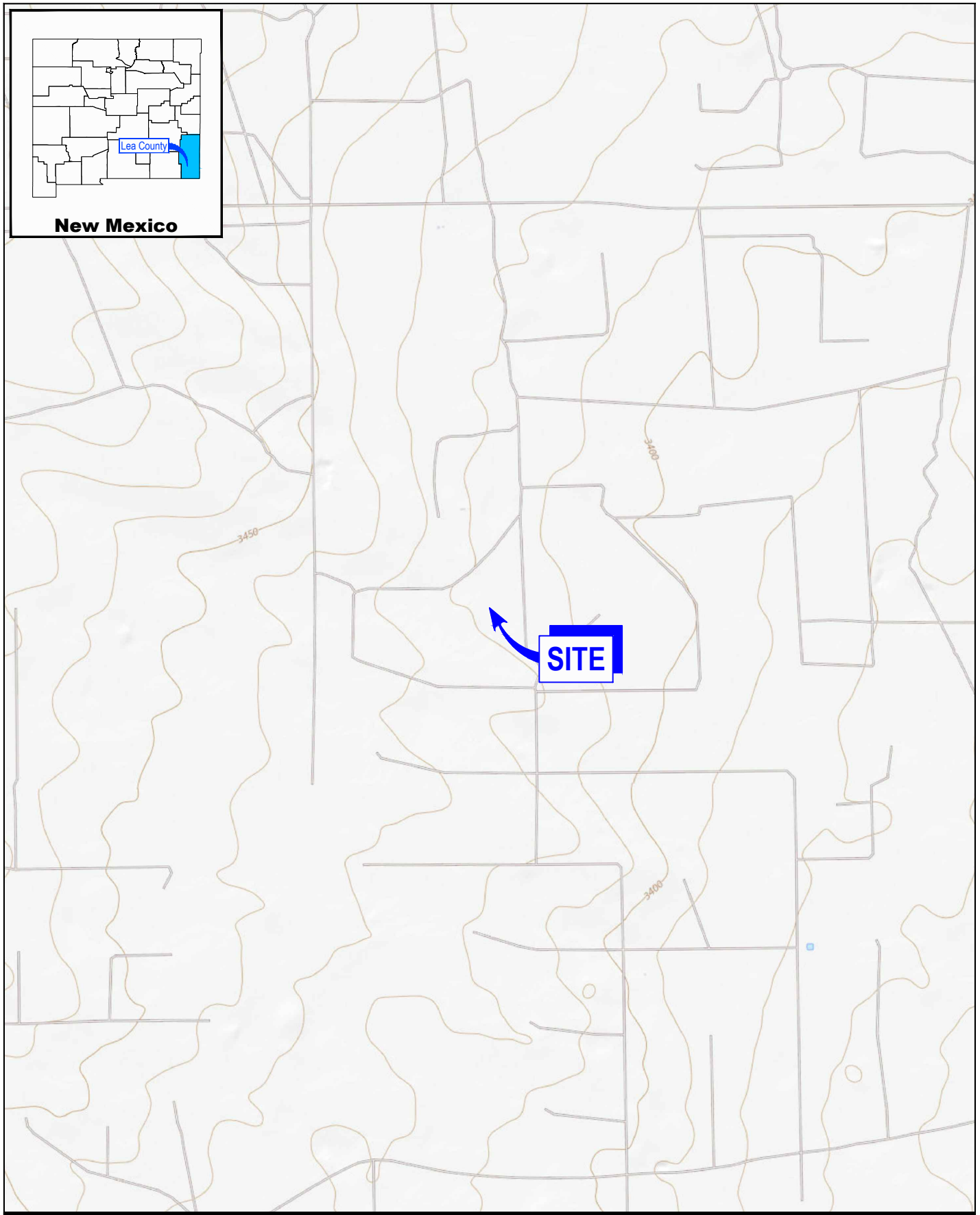


J.T. Murrey
Senior Project Director

Encl. Figure 1 – Site Location Map
Figure 2 – Release Area Map
Attachment A – Site Characterization/Assessment Documentation

cc: Dean Ericson, ETCTP

Figures



ETC TEXAS PIPELINE, Ltd.
LEA COUNTY, NEW MEXICO
M-4 RELEASE

Project No. 12608422
Date March 2023

SITE LOCATION MAP

FIGURE 1



ETC TEXAS PIPELINE, Ltd.
LEA COUNTY, NEW MEXICO
M-4 RELEASE

Project No. 12608422
Date March 2023

RELEASE AREA MAP

FIGURE 2

Attachment A

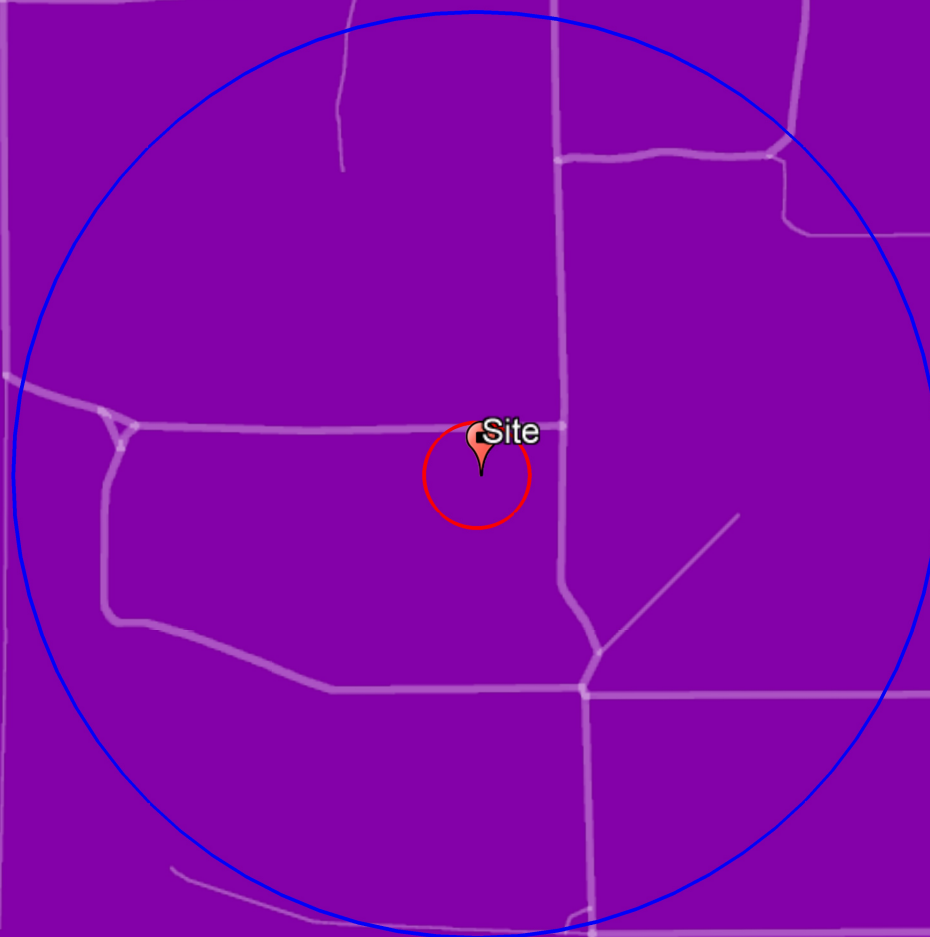
Site Characterization Documentation

MI-4 Release

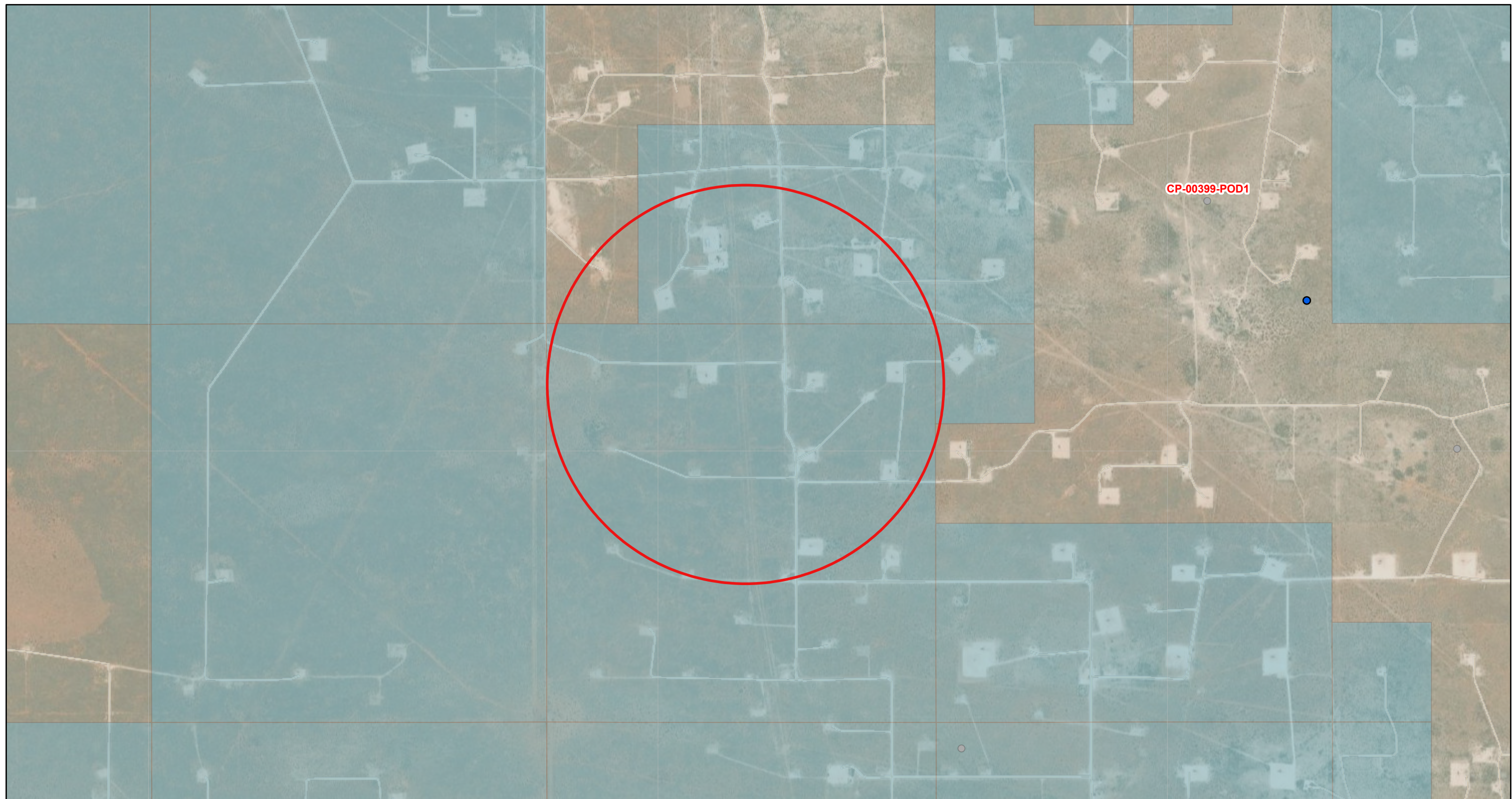
Karst Potential Map

Legend

-  0.5 Mile Radius
-  300 Feet Radius
-  High
-  Low
-  Medium
-  Site




OSE POD Locations Map



3/24/2023, 11:25:56 AM


 Override 1  OSE District Boundary New Mexico State Trust Lands

GIS WATERS PODs Water Right Regulations

 Both Estates

 SiteBoundaries

- Active

 Closure Area

1:18,056




0 0.17 0.35 0.7 mi

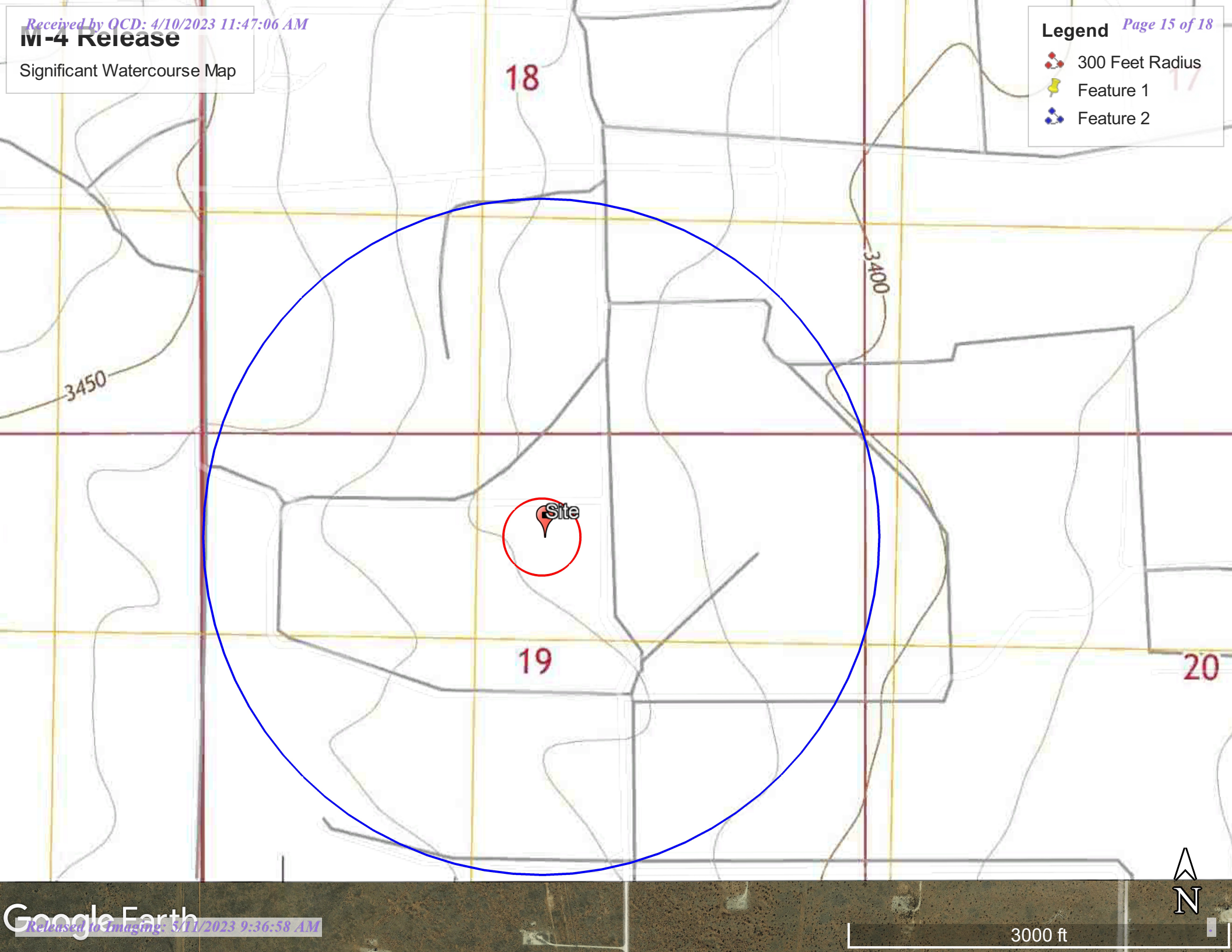
0 0.3 0.6 1.2 km

Esri, HERE, iPC, U.S. Department of Energy Office of
Legacy Management, Esri, HERE, Garmin, iPC, Maxar

MI-4 Release

Significant Watercourse Map

-  300 Feet Radius
-  Feature 1
-  Feature 2





U.S. Fish and Wildlife Service

National Wetlands Inventory

X



March 24, 2023

Wetlands

- Estuarine and Marine Deepwater
- Estuarine and Marine Wetland

- Freshwater Emergent Wetland
- Freshwater Forested/Shrub Wetland
- Freshwater Pond

- Lake
- Other
- Riverine

This map is for general reference only. The US Fish and Wildlife Service is not responsible for the accuracy or currentness of the base data shown on this map. All wetlands related data should be used in accordance with the layer metadata found on the Wetlands Mapper web site.

National Flood Hazard Layer FIRMette



103°12'25"W 32°23'12"N



0 250 500 1,000 1,500 2,000 Feet 1:6,000 103°11'47"W 32°22'41"N

Legend

SEE FIS REPORT FOR DETAILED LEGEND AND INDEX MAP FOR FIRM PANEL LAYOUT

SPECIAL FLOOD HAZARD AREAS		Without Base Flood Elevation (BFE) <i>Zone A, V, A99</i>
		With BFE or Depth <i>Zone AE, AO, AH, VE, AR</i>
		Regulatory Floodway
OTHER AREAS OF FLOOD HAZARD		0.2% Annual Chance Flood Hazard, Areas of 1% annual chance flood with average depth less than one foot or with drainage areas of less than one square mile <i>Zone X</i>
		Future Conditions 1% Annual Chance Flood Hazard <i>Zone X</i>
		Area with Reduced Flood Risk due to Levee. See Notes. <i>Zone X</i>
		Area with Flood Risk due to Levee <i>Zone D</i>
OTHER AREAS		NO SCREEN Area of Minimal Flood Hazard <i>Zone X</i>
		Effective LOMRs
GENERAL STRUCTURES		Area of Undetermined Flood Hazard <i>Zone D</i>
		Channel, Culvert, or Storm Sewer
OTHER FEATURES		Levee, Dike, or Floodwall
		20.2 Cross Sections with 1% Annual Chance Water Surface Elevation
		17.5 Cross Sections with 1% Annual Chance Water Surface Elevation
		Coastal Transect
		Base Flood Elevation Line (BFE)
		Limit of Study
		Jurisdiction Boundary
		Coastal Transect Baseline
		Profile Baseline
		Hydrographic Feature
MAP PANELS		Digital Data Available
		No Digital Data Available
		Unmapped

The pin displayed on the map is an approximate point selected by the user and does not represent an authoritative property location.

This map complies with FEMA's standards for the use of digital flood maps if it is not void as described below. The basemap shown complies with FEMA's basemap accuracy standards

The flood hazard information is derived directly from the authoritative NFHL web services provided by FEMA. This map was exported on **3/24/2023 at 1:23 PM** and does not reflect changes or amendments subsequent to this date and time. The NFHL and effective information may change or become superseded by new data over time.

This map image is void if the one or more of the following map elements do not appear: basemap imagery, flood zone labels, legend, scale bar, map creation date, community identifiers, FIRM panel number, and FIRM effective date. Map images for unmapped and unmodernized areas cannot be used for regulatory purposes.

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1625 N. French Dr., Hobbs, NM 88240
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Phone:(505) 334-6178 Fax:(505) 334-6170
District IV
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Phone:(505) 476-3470 Fax:(505) 476-3462

State of New Mexico
Energy, Minerals and Natural Resources
Oil Conservation Division
1220 S. St Francis Dr.
Santa Fe, NM 87505

CONDITIONS

Action 205611

CONDITIONS

Operator: ETC Texas Pipeline, Ltd. 8111 Westchester Drive Dallas, TX 75225	OGRID: 371183
	Action Number: 205611
	Action Type: [C-141] Release Corrective Action (C-141)

CONDITIONS

Created By	Condition	Condition Date
jnobui	Remediation Plan Approved.	5/11/2023